REMARKS

Favorable reconsideration is respectfully requested in light of the following remarks, wherein Claim 1 has been amended. Currently, Claims 1-6 and 11-22 are pending in the present application. Claims 3-6 and 11-22 are withdrawn.

Claims 1 and 2 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,235,147 to Lee et al. ("Lee"). Applicants respectfully traverse the rejection under 35 U.S.C. § 102(b).

Applicants have amended claim 1 to provide a different recitation relating to Applicants' invention. Claim 1, as amended, recites a discharging method that includes the step of "discharging said liquid and most of said solid matter present in the form of said spiral flow from a discharge port formed in a bottom of said container such that said solid matter is discharged substantially completely from said container." Support for claim 1 is provided at, for example, page 4, lines 24-27; page 5, lines 22-26; page 6, lines 23-27; page 8, lines 11-15; and page 20, lines 9-23.

Applicants respectfully submit that Lee does not disclose or render obvious a discharging method from a container for discharging solid matter stored in the container, as recited in claim 1. Lee relates to a wet etching facility for manufacturing semiconductor devices, as stated in col. 2, lines 13-14. However, the method of claim 1 recites solid matter stored in a container, a significantly different technical field and a significantly different purpose. In particular, the Examiner correlates the wafer contaminants of Lee with the solid matter recited in claim 1. However, Lee does not contemplate storing wafer contaminants in a container. The wafer contaminants are continuously discharged as evidenced by the lack of a valve or some other flow

preventer in the discharge outlet 10a shown in Figs. 3 and 10, the bottom outlet 10b shown in Fig. 5, and the discharge outlets 50a shown in Fig. 9. Also, Lee states in col. 1, lines 54-57, that an accumulation of etched impurities 2 is one of the main reasons that malfunctions occur in a conventional wet-etching facility and also results in inferior wafers. Thus, the wet-etching facility of Lee does not store any wafer contaminants. Therefore, the wet-etching facility of Lee is not only from a significantly different technical field, but also discloses a significantly different purpose and operation, in particular continuous discharge. Accordingly, Applicants respectfully submit that Lee does not anticipate the method of claim 1 and requests withdrawal of the rejection of claim 1 under 35 U.S.C. § 102(b).

Also, the wet-etching facility of Lee supplies a chemical 3 into a bath 10 that is continuously discharged. Thus, the chemical 3 is not stored in the bath 10, as evidenced by a lack of any valve in, for example, the discharge outlet 10a shown in Fig. 3. In contrast, the method of claim 1 recites supplying liquid into a container storing solid matter and discharging the liquid and substantially all of the stored solid matter. Thus, the method of claim 1 stores both the solid matter and the discharging liquid in a container. For example, the exemplary embodiment shown in Fig. 1 of Applicants' specification has a discharge valve 6 in the bottom of the container in order to store a mixture of the solid matter and liquid. Thus, the wet-etching facility of Lee discloses a significantly different operation than the method of claim 1. Therefore, Applicants respectfully submit that Lee does not anticipate the method of claim 1 and requests withdrawal of the rejection of claim 1 under 35 U.S.C. § 102(b).

Finally, Applicants respectfully submit that Lee does not disclose or render obvious a method for discharging solid matter stored in a container that includes the step of discharging

most of the solid matter such that the solid matter is discharged substantially completely from the container, as recited in claim 1. The wet-etching facility of Lee has a bath 1 that stores wafers 1, a wafer guide 20, and a chemical spray part 30 but discharges only the contaminants generated by an etching process of the semiconductor wafers 1. Thus, not all the solid matter in the bath 10 is discharged substantially completely from the bath 1. In contrast, the method of claim 1 stores solid matter in a container and discharges substantially completely the solid matter together with the discharging liquid from the container. Thus, Lee does not disclose or render obvious all the features of claim 1. Therefore, because at least one feature is not disclosed or rendered obvious, Applicants respectfully submit that a *prima facie* case of anticipation has not been made against claim 1.

Should any questions arise in connection with this application, or should the Examiner believe a telephone conference would be helpful in resolving any remaining issues pertaining to this application, it is respectfully requested that the undersigned be contacted at the number indicated below.

EXCEPT for issue fees payable under 37 C.F.R. § 1.18, the Commissioner is hereby authorized by this paper to charge any additional fees during the entire pendency of this application including fees due under 37 C.F.R. §§ 1.16 and 1.17 which may be required, including any required extension of time fees, or credit any overpayment to Deposit Account 50-0573. This paragraph is intended to be a CONSTRUCTIVE PETITION FOR EXTENSION OF TIME in accordance with 37 C.F.R. § 1.136(a)(3).

Respectfully Submitted,

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